

STEPHANIE HINDS, CSBN 154284
United States Attorney
PETER K. THOMPSON, HIBN 5890
Acting Regional Chief Counsel, Region IX
Social Security Administration
MARGARET BRANICK-ABILLA, CSBN 223600
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, CA 94105-1545
Telephone: (510) 970-4809
Facsimile: (415) 744-0134
E-mail: Margaret.Branick-Abilla@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

KAREN LEWIS,

Plaintiff,

vs.

KILOLO KIJAKAZI, Acting Commissioner of
Social Security,

Defendant.

Civil no. 4:21-cv-02755-KAW

**STIPULATION FOR EXTENSION OF
TIME; ORDER AS MODIFIED**

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys,
with this Court's approval, to extend the time by 60 days, from March 16, 2022, to May 15, 2022, for
Defendant to respond to Plaintiff's Motion for Summary Judgment. All other dates in the Court's Case
Management Order shall be extended accordingly.

Stip. for Extension, Order As Modified
4:21-cv-02755-KAW

This is Defendant's first request for an extension of time. The undersigned counsel for the Commissioner is going to be out of the office assisting an aged parent for an extended period of time in March. Additionally, due to attorneys taking unexpected leave or resigning during the past six months, the undersigned counsel for the Commissioner has had numerous cases reassigned to her, including cases requiring imminent briefing, cases with past due matters that must be remedied, and cases in which the undersigned is supervising other attorneys. As a result of leave and the press of other work, the undersigned counsel for the Commissioner needs additional time in the instant case to review the exceptionally large 8200 page administrative record, to consider the multiple issues that Plaintiff has raised, and to determine whether options exist for settlement.

Defendant requests this extension in good faith and with no intent to unduly delay these proceedings unnecessarily. Plaintiff does not oppose the requested extension of time.

Respectfully submitted,

Dated: February 28, 2022

PAUL HASTINGS LLC

By: /s/ Monica C. Molina*
 MONICA C. MOLINA
 Attorneys for Plaintiff
 [*As authorized by email on Feb. 28, 2022]

Dated: February 28, 2022

STEPHANIE HINDS
 United States Attorney

By: /s/ Margaret Branick-Abilla
 MARGARET BRANICK-ABILLA
 Special Assistant United States Attorney
 Attorneys for Defendant

ORDER AS MODIFIED

IT IS SO ORDERED. Defendant's response to Plaintiff's Motion for Summary Judgment shall be due May 16, 2022, with all other dates in the Scheduling Order extended accordingly. No further extensions shall be granted.

Dated: March 1, 2022

By:


HON. KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE